



# State Fire Marshal Code Adoption Workgroup Format Guidelines 12/5/2005

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*Protecting life and property through the development and application of fire prevention engineering, education and enforcement*

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## **Directions to the SFM Work Groups**

Initial direction was provided to the workgroup members at the time of the initial kick-off meetings. We are now at the time for the Core Group to begin review of preliminary drafts from the workgroups. The following guidelines are offered to supplement the initial directions.

**General Directive:** The Workgroups primary task is the comparison of the current building and fire codes/regulations adopted in California with the model codes proposed to be adopted, IBC and IFC, and suggestion of amendments to be recommended to the SFM.

**Objective:** Provide an objective comparison between the adopted 2001 CBC and CFC and the 2006 International Building Code and International Fire Code. The comparison will be based on a holistic perspective. The comparison will result in proposed amendments where necessary to meet statutory mandates and maintain an acceptable level of fire and life safety (substantially equivalent level of protection to that enjoyed in California to date). The following guidelines offer a recommended process for the workgroups to follow. Use of these guidelines will assure a uniform approach at the evaluation of the codes resulting with end products that because of their similarity, will facilitate consolidation when preparing the final recommendations to the SFM.

## **Instructions:**

1. Record assigned occupancy.
2. Review occupancy requirements from 2001 CBC and CFC including CA amendments.

3. Review occupancy requirements from 2006 IBC and IFC.
4. Compare the two sets of regulations.
  - a. Compare current SFM adoption in the CBC and CFC with the 2006 IBC and IFC.
  - b. Review the statutory amendments identified on the SFM website and determine if the model code addresses the statutory intent.
  - c. Compare the occupancy as designed under each code (sum of parts/systems) and determine the overall differences. This is what is referred to as the “holistic” approach.
  - d. Look at equivalent level of safety rather than specific duplicate requirements. For example: building larger in height/area under IBC, but required to be protected with fire sprinklers that would not be required by CBC.
5. Determine the relevance of the difference between the code requirements.
  - a. Does it make the building less safe? How? Magnitude? Redundancies?
  - b. If the existing State amendment is not specified in statute, does it significantly impact fire and life safety? When considering the significance offered by this type of amendment, things you may consider are landmark/ historical incidents and loss history of buildings constructed similarly in other jurisdictions both in California and nationally.
  - c. Is the current state amendment addressed in the new model code with a specific or nonspecific provision even if it is addressed in another manner, or in another section?
6. Identify the type of amendment necessary to meet objective. See examples below on how to identify the amendment type. The letter identification is to be placed before the first sentence in the purpose/rationale statement.
  - a. Statutory-driven (**S**): These provisions need to be added to model code because state law requires specific action by the State Fire Marshal.  
**NOTE:** If a current statute driven CA amendment does not need to be carried forward because it is adequately covered in the IBC/IFC provisions, then document where the requirements are located.
  - b. SFM developed (**SFM**)\* - These provisions need to be added to model code not necessarily in response to a specific legislative direction, but to:
    - i. Continue fire/life safety issues previously and necessarily addressed by the SFM, e.g. amendments to NFPA 72, National Fire Alarm Code found in CBC Chapter 35.; and ,
    - ii. Address issues regulated by the SFM but not addressed in the model code, e.g., Motion Picture Production Studios, Fixed-rail Guideway Stations.
  - c. New amendments (**N**) – necessary to address significant fire or life safety issues covered by the current State code but not adequately addressed in model code.

7. Develop amendments including all text shown in underline and strikeout format. Use “Arial” font, 12 point size. Proposed amendments shall be consistent with model code language in format and wording. (e.g., “not prohibited” found in IBC versus “is permitted” found in UBC)
  - a. For Statutory amendments, (S), any necessary wordsmithing of amendment language used in the CBC/CFC must keep the regulation in conformance with the terms of the mandating statute.

NOTE: If the workgroup did not address or cannot resolve an issue, particularly those listed on Attachment 1 due to inadequate time, lack of technical expertise, or problem developing the purpose/rationale statement, please not the identified item for consideration by the Core Group.

8. Develop a purpose and rationale statement for the amendment. This is a plain-language explanation that will be necessary for each amendment. If there are a group of amendments that must be considered together in order to properly effect the change proposed, they must be clearly grouped and identified in the purpose and rationale statement.
9. Workgroups do not need to develop an impact statement or an Initial Statement of Reasons. Once the entire package is assembled by the Core Group and all of the amendments are collated into the submittal package, the SFM Office will develop an Initial Statement of Reasons for the package as a “whole”. The SFM Office can draw on the comments of the workgroups if input is needed.
10. Documentation of all amendments including Purpose and Rationale shall be formatted as shown on the following page.

**THE FOLLOWING ARE VARIOUS TYPES OF AMENDMENTS YOU MAY  
ENCOUNTER, AND ARE EXAMPLES OF ADDED, REPEALED TEXT AND OF  
THE “PLAIN ENGLISH” PURPOSE/RATIONALE STATEMENTS.**

**EXAMPLE #1**

In this example a completely new non-statutory section (N) is proposed for addition to Chapter 4. As this section is entirely new language it is shown underlined. No section number is shown, however, a suggestion should be suggested as a note following the expressed terms of the section. An example of a purpose/rationale statement is included here. This statement makes reference to another model code, however, that mere fact is not justification in an of itself.

**Chapter 4 XX  
SPECIAL DETAILED REQUIREMENTS BASED ON USE AND OCCUPANCY**

**##### Special Hazards.** Devices generating a glow, spark or flame capable of igniting flammable vapors shall be installed such that sources of ignition are at least 18 inches above the floor of any room in which Class I flammable liquids or flammable gases are used or stored.

**Purpose/Rationale:**

(N) This provision exists in the International Mechanical Code, which is not being considered for adoption. It is proposed for inclusion in the building code where design professionals most likely to implement the requirement will more easily locate it. The same provision currently exists in the State building code and the proposed code is deficient without this addition.

This provision is included in the Uniform Plumbing Code (2003 UPC 510.1) which is proposed for adoption but it is specific to water heaters and applies only in garages (need to check 2006 additions). This requirement, as proposed, will apply in locations where flammable vapors and ignition sources may commingle. Ignition sources must be protected for open flame devices to reduce the potential for ignition and explosion, e.g., garage explosion due to vapors from the gas container, lawn mower, or vehicles contacting the water heater located at grade. Experience indicates commingling of flammable vapors and ignition sources results in fire and/or explosion.

**EXAMPLE #2**

In this example a (N)new non-statutory exception is being proposed. Note that all new language is shown underlined.

**Section 1013 EXIT ACCESS**

**1013.2 Egress through intervening spaces.** Egress from a room or space shall not pass through adjoining or intervening rooms or areas, except where such adjoining rooms or areas are accessory to the area served; are not a high-hazard occupancy; and provide a discernible path of egress travel to an exit. Egress shall not pass through kitchens, storage rooms, closets or spaces used for similar purposes. An exit

access shall not pass through a room that can be locked to prevent egress. Means of egress from a dwelling units or sleeping areas shall not lead through other sleeping areas, toilet rooms or bathrooms.

**Exceptions:**

1. Means of egress are not prohibited through a kitchen area serving adjoining rooms constituting part of the same dwelling unit or guestroom.
2. Means of egress are not prohibited through rooms or spaces in a high-hazard occupancy where such rooms or spaces are the same occupancy group.
3. Exits will not pass through any room subject to locking except in Group I, Division 3 Occupancies classified as detention facilities and Group I, Division 2 Occupancies classified as mental hospitals.

**Purpose/Rationale:** (N) Purpose and rationale statement would follow the (N) designator here.

**EXAMPLE #3**

In this example a portion of the model code describing uses to be included within the occupancy classification are proposed to be not adopted. The text proposed to be removed is shown with the ~~striketrough~~ feature. The Purpose/Rationale statement, following the (N) designator, for this proposal must show why the model code provision would not be acceptable in California. In this particular case, there are two separate reasons. Detoxification facilities are addressed in other SFM amendments, so the reference here would be confusing. The last sentence of this section is also proposed to be removed as it references a code, IRC, which is not scheduled for adoption at this time.

**308.3 GROUP I-2.** This occupancy shall include buildings and structures used for medical, surgical, psychiatric, nursing or custodial care on a 24-hour basis of more than five persons who are not capable of self-preservation. This group shall include, but not be limited to, the following:

Hospitals

Nursing homes (both intermediated-care facilities and skilled nursing facilities)

Mental hospitals

~~Detoxification facilities~~

~~A facility such as the above with five or fewer persons shall be classified as Group R-3 or shall comply with the *International Residential Code* in accordance with Section 101.2~~

**Purpose/Rationale:** (N) The purpose and rationale for removing the model code text from the State adoption must be shown here, immediately following the (N) designator.

**EXAMPLE #4**

This is an example of a statutory-driven amendment (S). In this example, the amendment is proposed as a new exception to a model code provision in chapter 9. All new text is shown underlined. The purpose/rationale statement need only show the proposal satisfies

the statutory intent by either referencing the mandating statute (i.e. Health and Safety Code 13113) or by reprinting the statute if possible.

**[F] 903.2.5 Group I.** An automatic sprinkler system shall be provided throughout buildings with a Group I fire area.

**Exceptions:**

1. When not used in accordance with Section 504.2 or 506.3 an automatic sprinkler system installed in accordance with Section 903.3.1.2 or 903.1.3 shall be allowed in Group I-1 facilities.

Occupancies housing ambulatory children only, none of whom are mentally ill or mentally retarded, and the buildings or portions thereof in which such children are housed are not more than two stories in height and buildings or portions thereof housing such children have an automatic fire alarm system activated by approved smoke detectors.

**Purpose/Rationale: (S)** This amendment is necessary in order to comply with the statutory provisions in Health and Safety Code §13113.